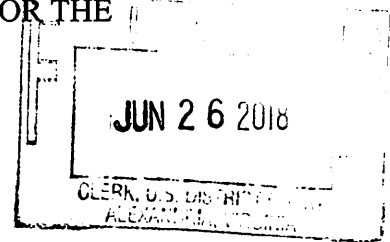


IN THE UNITED STATES DISTRICT COURT FOR THE

EASTERN DISTRICT OF VIRGINIA

Alexandria Division



IN THE MATTER OF THE SEARCH OF )  
THE PREMISES LOCATED AT 370 ) Case No: 1:17-SW-294  
HOLLAND LANE, UNIT 3013 )  
ALEXANDRIA, VIRGINIA 22314 )

**GOVERNMENT'S MOTION TO UNSEAL  
REDACTED VERSION OF SEARCH WARRANT**

The United States of America, by and through Special Counsel Robert S. Mueller, III, respectfully moves the Court for an Order to unseal a redacted version of the application for search warrant, affidavit in support of the search warrant, search warrant, and related materials ("Warrant") in the above captioned matter. A copy of the proposed redacted Warrant to be unsealed is attached hereto as Exhibit A.

On February 22, 2018, a grand jury sitting in the Eastern District of Virginia returned an indictment against Paul J. Manafort, Jr. and Richard W. Gates III, who were subjects of the investigation giving rise to the Warrant. The Indictment charges Manafort with subscribing to false income tax returns, in violation of 26 U.S.C. § 7206(1) (Counts 1-5); failing to file reports of foreign bank accounts, in violation of 31 U.S.C. §§ 5314, 5322(a) (Counts 11-14); and bank fraud conspiracy and bank fraud, in violation of 18 U.S.C. §§ 1344, 1349 (Counts 24-32).

On November 8, 2017, at the government's request this Court unsealed the Warrant for the limited purpose of disclosing the material to defense counsel to comply with the government's discovery obligations. The government subsequently provided defense counsel with a redacted version of the Warrant. In all other respects, the Warrant remains sealed until further order from this Court.

On April 30, 2018, Manafort moved the Court to suppress evidence and all fruits thereof

resulting from the Warrant in *United States v. Manafort*, 1:18-CR-83 (E.D. Va.) (Doc. No. 45). Defendant's motion to suppress is currently set for a hearing on Friday, June 29, 2018. The government anticipates the Warrant may be offered as an exhibit during the hearing.

Accordingly, the government now requests that the Court unseal the Warrant with appropriate redactions. Redactions to the Warrant are appropriate because it contains information about non-public ongoing investigation, sensitive law enforcement information, and personal identifying information related to uncharged individuals. *Cf.* U.S. Attorney's Manual § 1-7.400(B) (stating Department of Justice policy against commenting on an ongoing investigation "before charges are publicly filed"); Fed. R. Crim. P. 49.1 (requiring redaction of certain personally identifying information). Unsealing a redacted version of the Warrant is an appropriate way to balance the government's interest in making a fulsome response to Manafort's motion to suppress and the public interest in access to court documents.

Thus, the government asks this Court to unseal the redacted Warrant attached as Exhibit A.

Respectfully submitted,

ROBERT S. MUELLER, III  
Special Counsel

Dated: June 22, 2018

Uzo Asonye  
Assistant United States Attorney  
Eastern District of Virginia

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Andrew Weissmann  
Greg D. Andres  
Special Counsel's Office  
U.S. Department of Justice  
950 Pennsylvania Avenue NW  
Washington, D.C. 20530  
Telephone: (202) 616-0800

*Attorneys for the United States of America*